

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: RANDELL L. GERMAN
AND PAMELA J. GERMAN**

CHAPTER 13

DEBTORS

CASE NO. 16-10370 JDW

MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION

COME NOW, Randell and Pamela German, Debtors, pursuant to 11 U.S.C. § 1329, and by and through their attorney of record, and states as follows:

1. That, Debtors' Chapter 13 Plan was confirmed on May 20, 2016 [dkt. # 22], and provides for a plan period of 60 months with a 100% distribution being paid to unsecured creditors with timely filed claims.
2. That, since confirmation of Debtors' plan, Debtor, Randell German, has retired due to health issues and the Debtors' income has significantly decreased, as shown in Amended Schedule I on file with the Court.
3. That, The Debtors' would request their distribution to unsecured creditors be reduced to the amount already paid.
4. All creditors listed on the mailing matrix shall have a minimum of 30 days from the date of filing of the motion to file a response or objection with the Court.

WHEREFORE, PREMISES CONSIDERED, Debtors move this Honorable Court to enter an order directing the modification of Chapter 13 plan after confirmation.

RESPECTFULLY SUBMITTED,
/s/Karen B. Schneller
KAREN B. SCHNELLER, MSB#6558
ROBERT H. LOMENICK, MSB #104186
SCHNELLER & LOMENICK, P.A.
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CASE NO. 16-10370 JDW

NOTICE OF MOTION

PLEASE TAKE NOTICE that all responses are due on or before thirty (30) days from the date of this notice, to consider and act upon the Motion for Modification of Chapter 13 Plan After Confirmation.

Should any party receiving this notice respond or object to said motion such response or objection is required to be filed with the Clerk of this Court, U.S. Bankruptcy Court, Northern District of Mississippi, 703 Highway 145 North, Aberdeen, Mississippi 39730, and served on the Attorney for the Movant on or before said objection due date. If any objection or response is filed, the Court will notify the parties of a date, time and place for the hearing thereon, otherwise, the Court may consider said motion immediately after the objection or response due date.

RESPECTFULLY SUBMITTED, this the 4th day of September, 2018.

/s/Karen B. Schneller
KAREN B. SCHNELLER, MSB#6558
ROBERT H. LOMENICK, MSB #104186
SCHNELLER & LOMENICK, P.A.
126 North Spring Street
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CERTIFICATE OF SERVICE

I, Karen B. Schneller/Robert H. Lomenick, Attorney for Debtor, do hereby certify that I have this day mailed postage prepaid and/or via electronic delivery, a true and correct copy of the above and foregoing Motion To Modify Chapter 13 Plan After Confirmation and Notice of Motion to:

Locke D. Barkley
Chapter 13 Trustee
6360 I-55 North, Suite 140
Jackson, MS 39211

Office of the U. S. Trustee
501 East Court Street, Suite 6-430
Jackson, MS 39201

all creditors on matrix

This the 4th day of September, 2018

/s/Karen B. Schneller
KAREN B. SCHNELLER
ROBERT H. LOMENICK